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EX PARTE

Electronic Filing via ECFS

May 1, 2007

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: In the Matter of Developing a Unified Intercarrier Compensation Regime,
CC Docket 01-92

Dear Ms. Dortch:

On May 1, 2007, Melissa Newman and Lisa Hensley Eckert, in person, and Tim Boucher, Jeff Lords, Shelly Eggert and Rachel Torrence, by phone, all of Qwest, met with Al Lewis, Deena Shetler, Jay Atkinson, Victoria Goldberg, Lynne Engledow and Chris Barnekov of the Wireline Competition Bureau to discuss the above-captioned proceeding.

The attached document was used as the basis for discussion.

This *ex parte* is being filed electronically pursuant to 47 C.F.R. §§ 1.49(f) and 1.1206(b).

Sincerely,

/s/ Melissa E. Newman

Enclosure

Copy via email to:
Al Lewis
Deena Shetler
Jay Atkinson
Victoria Goldberg
Lynne Engledow
Chris Barnekov

Phantom Traffic

**Developing a Unified Inter-carrier Compensation Regime
CC Docket 01-92**

Qwest Ex Parte

May 1, 2007

Defining the Phantom Traffic Problem

- Phantom traffic definitions vary depending on the carrier's interest.
 - Restricting discussion solely to transit traffic to rural ILECs is not a holistic solution to phantom traffic problem.
 - There are a number of ways in which traffic can be improperly categorized and improperly billed.

Examples of Additional Types of Phantom Traffic

- Wireless originated intra MTA
- Wireless Insertion
- Erroneously designated traffic
 - Intrastate traffic as interstate
 - Long distance as local
- MF signaling limitations

Proposed Solution Does Not Address the Examples

- As long as arbitrage opportunities exist, there will be an incentive to misrepresent traffic.
- Shifting the burden to carriers who are not the originators fails to solve the problem.
- South Dakota has addressed this issue:
 - Originating carrier is responsible for payment of termination charges, except in the very limited exception where the transit carrier fails to pass on signaling data